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Application GRANTED. The parties shall jointly file a proposed civil case management plan and scheduling order by November 2, 2022.

October 12, 2022

VIA ECF

Dated: October 13, 2022
New York, New York

The Honorable Lorna G. Schofield
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Consent Motion for Extension of Time to File Proposed Case Management Plan for *King v. Habib Bank Ltd.*, Case No. 20-cv-4322-LGS

Dear Judge Schofield:

On September 28, 2022, the Court granted in part and denied in part Defendant's motion to dismiss, and ordered the parties to meet and file a proposed civil case management plan and scheduling order by October 19, 2022. See Dkt. No. 56. Pursuant to the Court's Individual Rules and Procedures for Civil Cases, the parties respectfully request a 14-day extension to file the proposed case management plan and scheduling order to November 2, 2022. This is the first request for an extension of time to file the proposed case management plan and scheduling order.

Good cause exists for the requested extension. The undersigned counsel and his colleagues at Susman Godfrey L.L.P. have just entered appearances in the case as lead trial counsel for Plaintiffs in this action and need the additional time to confer on case management issues with the Defendant. Moreover, the parties are discussing several important case management issues, including whether an agreement can be reached regarding the initial scope of discovery, the timing of Defendant's renewed motion to dismiss on personal jurisdiction, and the degree to which foreign bank secrecy issues may impact discovery. The additional time will assist the parties to determine the degree to which any dispute on those issues can be resolved without Court intervention.


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

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For the foregoing reasons, the parties respectfully move that the time to file the proposed civil case management plan and scheduling order be extended to November 2, 2022.

Sincerely,

/s/ Ian M. Gore

Ian M. Gore